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*Attorneys for Defendants LG Electronics U.S.A.,
Inc.; Lowe's Home Centers, LLC; BestBuy.Com,
LLC; Best Buy Stores, L.P.; and Costco Wholesale
Corporation*
**Admitted pro hac vice*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOHN HERNANDEZ, et al., and on
behalf of all others similarly situated

Plaintiffs,

vs.

LG ELECTRONICS U.S.A., Inc., et al.

Defendants.

Case No. 2:22-cv-08813-SVW-JEM

Hon. Stephen V. Wilson

**DEFENDANTS BEST BUY
STORES, L.P.'S AND
BESTBUY.COM, LLC'S NOTICE
OF MOTION AND MOTION TO
COMPEL ARBITRATION**

**[Memorandum of Points and
Authorities, Declaration of Mike
Wang, Declaration of Daniel Poplau,
Declaration of Scott DeToffol,
Declaration of Lauren Wallen, and
[Proposed] Order Filed Concurrently
Herewith]**

9 U.S.C. § 1 *et seq.*

Date: Monday, February 12, 2024
Time: 1:30 PM
Location: Courtroom 10A

1 **NOTICE OF MOTION AND MOTION**

2 **TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:**

3 **PLEASE TAKE NOTICE** that, on February 12, 2024, or as soon thereafter
4 as the matter may be heard in Courtroom 10A, 10th Floor, of the United States
5 District Court for the Central District of California, located at 350 W. 1st Street, Los
6 Angeles, California, 90012, defendants BestBuy.Com, LLC and Best Buy Stores,
7 L.P. (together “Best Buy”) will, and hereby do, move the Court for an order staying
8 this case and compelling Plaintiff Linda Reichello to arbitrate this dispute through
9 individual arbitration. This Motion is made pursuant to the Federal Arbitration Act,
10 9 U.S.C. § 1 *et seq.*, on the grounds that this dispute is subject to a valid arbitration
11 agreement. Staying Plaintiff’s claims so that the Parties may resolve this dispute
12 through individual arbitration would effectuate that agreement, and would also serve
13 the interests of justice and promote judicial economy.

14 This Motion is based on this Notice of Motion and Motion, the accompanying
15 Memorandum of Points and Authorities, the accompanying Declaration of Mike
16 Wang, the accompanying Declaration of Daniel Poplau, the accompanying
17 Declaration of Scott DeToffol, the accompanying Declaration of Lauren Wallen, the
18 pleadings, records, and files in this action, and any argument that the Court may
19 entertain at any hearing on this matter. This Motion is made pursuant to the Court’s
20 Scheduling Notice entered on December 26, 2023.

1 Dated: January 16, 2024

By: /s/ Vassi Iliadis

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21 *BestBuy.Com, LLC; Best Buy Stores, L.P.;*
22 *and Costco Wholesale Corporation*
23 **Admitted pro hac vice*

PRE-FILING MEET AND CONFER CERTIFICATION

I certify, pursuant to Local Rule 7-3, that counsel for Defendants BestBuy.Com, LLC and Best Buy Stores, L.P. met and conferred with counsel for Plaintiffs at the Status Conference on October 10, 2023.

Respectfully submitted,

Dated: January 16, 2024

By: /s/ Vassi Iliadis

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